

EXHIBIT 311

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7)) 1:17-MD-2804
8 THIS DOCUMENT RELATES TO) Hon. Dan A.
9 ALL CASES) Polster
10)

11 Wednesday, — — —
12 January 23, 2019
13 — — —

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW
16 — — —

17 Videotaped Deposition of SUSANNE
18 HILAND, held at 4206 South J.B. Hunt Drive,
19 Rogers, Arkansas, commencing at 8:25 a.m., on
20 the above date, before Debra A. Dibble,
21 Certified Court Reporter, Registered
22 Diplomate Reporter, Certified Realtime
23 Captioner, Certified Realtime Reporter and
24 Notary Public.
25 — — —

26 GOLKOW LITIGATION SERVICES
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14 ALSO PRESENT:
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16 Jennifer B. Bechet
Senior Associate Counsel
17 Walmart, Inc.

18 THE VIDEOGRAPHER:
19 Chris Ritona
20 Golkow Litigation Services
21
22
23
24
25

— — —

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[REDACTED]

4 October 24th, 2017. Remind me when Walmart
5 decided to exit the distribution --
6 self-distribution of Schedule II narcotics.

7 MS. TABACCHI: Object to the
8 form. Lack of foundation.

9 THE WITNESS: I don't know when
10 the decision was made. We exited in
11 April 2018 for C-IIIs.

12 Q. (BY MR. INNES) Okay. Was that
13 all C-IIIs?

14 A. Yes.

[REDACTED]

[REDACTED]

[REDACTED] -- [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] -- [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] -- [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]